

**INTEGRATIVE THERAPEUTICS INC.***NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY***&
PHYTOPHARMICA***

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY*What Better feels like™*

December 8, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Boosts memory function.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

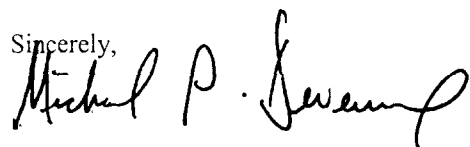
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17094

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael P. Devereux
Chief Operations Officer

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Helps maintain urinary tract health.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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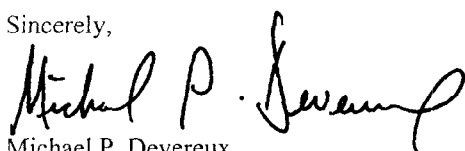
Title: Senior Vice President of Scientific Affairs

Date: _____

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Michael P. Devereux
Chief Operations Officer

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Supports healthy aging.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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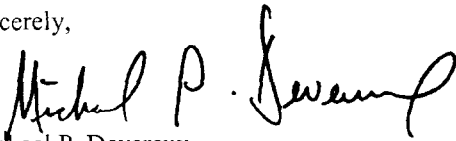
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Michael P. Devereux
Chief Operations Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	The rich, vibrant colors of fruits and vegetables aren't just for decoration. They're nature's way of telling you that these foods are bursting with a wide range of vitamins, nutrients and phytonutrients – naturally occurring, plant-based antioxidants that support a vast array of health benefits ranging from immune to heart to vision health and much more.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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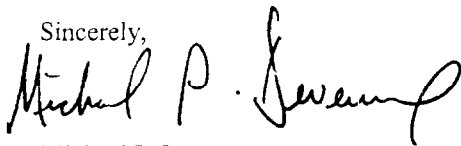
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Michael P. Devereux
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Helps promote healthy memory function.*	Anthocyaninis (from Fruit and Vegetable Blends)

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By: 

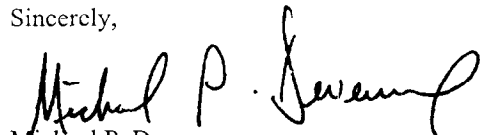
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Supports the immune system.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate)

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Date: 12-9-05

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Supports the immune system and healthy cell development.*	Ellagic Acid (from Fruit and Vegetable Blends)

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Date: _____

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Naturally protective antioxidants that support healthy aging and give fruits and vegetables their coloring.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Helps maintain a healthy heart*	Quercetin (from Fruit and Vegetable Blends)

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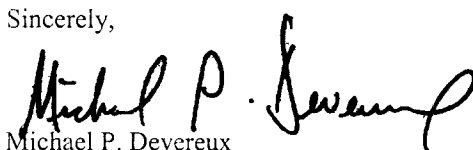
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Earth's Promise Purple 11e